

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

)
FRITX JOHN HOEFLEIN, III,)
and RAUL SOLIS, III,)
Individually and on) CIVIL ACTION
Behalf of all Others)
Similarly Situated,) NO.:
) 5:19-cv-01194-FB-ESC
VS.)
) FLSA Collective Action
CRESCENT DRILLING AND)
PRODUCTION, INC., and)
CRESCENT DRILLING)
FOREMAN, INC.,)

ORAL AND VIDEOTAPED DEPOSITION OF VICTOR MANUEL JUAREZ
January 19, 2022

ORAL AND VIDEOTAPED DEPOSITION OF VICTOR MANUEL JUAREZ, produced as a witness at the instance of the DEFENDANT(S), and duly sworn, was taken in the above-styled and numbered cause on the 19th day of January, 2022, from 9:32 a.m. to 12:55 p.m., via Zoom, before Shauna L. Beach, in and for the State of Texas, reported by machine shorthand, at the law offices of Bruckner Burch, PLLC, 8 Greenway Plaza, Suite 1500, Houston Texas 77046, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

A P P E A R A N C E S

FOR THE PLAINTIFF:

DAVID I. MOULTON
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FOR THE DEFENDANT:

BRIAN A. SMITH
Seyfarth Shaw, LLP
700 Milam Street
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ALSO PRESENT:

Brandi Pate, Videographer
SB Company

Lisa Africk (Appearing via Zoom)
General Counsel for Crescent
Scott McDonald (Appearing via Zoom)
President and CEO for Crescent

Larry Cress (Appearing via Zoom)

1 MR. SMITH: Okay.

2 Are they making copies of that, Dave?

3 MR. MOULTON: Yes.

4 MR. SMITH: All right. We'll come back to
5 that when they're done making copies, then.

6 Q. (By Mr. Smith) The farm, how do you get it
7 your farm?

8 A. Driving from Laredo from my house to the farm.

9 Q. Okay. If you drive there, you know the
10 address, right?

11 MR. MOULTON: Objection; form.

12 A. Not -- no, sir.

13 Q. (By Mr. Smith) So your testimony is that you
14 do not know the address to your farm?

15 A. Not the physical address.

16 Q. Okay. What do you know? You said not the
17 physical address. Is there something you do know?

18 MR. MOULTON: Objection; form.

19 A. No, sir.

20 Q. (By Mr. Smith) What year did you start the
21 farm?

22 A. I don't remember.

23 Q. Was the farm around in 2015?

24 A. No, not yet. I believe not. I didn't start --
25 no, I don't -- I don't remember.

1 Q. How many acres is the farm?

2 A. 10 acres.

3 Q. What highway do you take to get to the farm?

4 A. Highway 83.

5 Q. You can name -- can you give me the route that
6 you take from your house to the farm?

7 A. It's -- you get on -- my address was REDACTED
8 REDACTED . Hit Mines Road, Route 20, 83, straight to
9 it.

10 Q. If I showed -- if we pulled up your address
11 on my phone, Google maps, could you give me a route?

12 A. My address from my house?

13 Q. Yes.

14 A. Yeah.

15 Q. Okay. We'll do that. REDACTED , right?
16 Okay.

17 MR. SMITH: Do you mind if I get closer to
18 him?

19 MR. MOULTON: Let me move this stuff.

20 Q. (By Mr. Smith) All right. So this is your
21 house here, correct?

22 A. Uh-huh. (Witness answers affirmatively.)

23 Q. REDACTED ?

24 A. Yes, sir.

25 Q. And tell me the first thing you do when you're

1 going to the farm when you leave your house.

2 A. I just get out from the house on Peoples and
3 you -- (Audio distorted.)

4 Q. Okay. So --

5 A. --there's my house.

6 Q. What direction do you turn on Peoples?

7 A. I mean, not Peoples, REDACTED , you turn left.

8 Q. Okay.

9 A. And then you turn right and go up left again on
10 Peoples.

11 Q. Okay.

12 A. Go all the way -- all the way -- all of the
13 way -- all the way -- keep on going. That's the main
14 entrance. That's the boulevard, right?

15 Q. Yeah.

16 A. And then there's Mines Road at the --

17 Q. 1472?

18 A. Yeah.

19 Q. Okay. What direction do you turn on 1472?

20 A. The left, that way. There's one way -- there's
21 right and there's left only place.

22 Q. So you're going, you know, southeast?

23 A. Yeah.

24 Q. And then what do you do off of 1472?

25 A. Let's just keep ongoing to Loop 20. There's

1 going to be a road to Loop 20. There it is. I think it
2 is. Yeah.

3 Q. Yep. So 69 west, I-69?

4 A. Yeah.

5 Q. Okay. What direction do you turn on that?

6 A. Left.

7 Q. So you're going this way now.

8 A. East.

9 Q. Okay.

10 A. Yeah. And just keep on all the way west. And
11 then, is that 83?

12 Q. Yes.

13 A. Great. Is it that way or is it this way? It's
14 both ways.

15 Q. Yeah. Well, it goes north and south.

16 A. It's going to go south.

17 Q. Okay.

18 A. Oh, no, that's 35 South.

19 Q. It's the same highway.

20 A. Oh. Okay. Okay.

21 Q. 83, 35.

22 A. Okay. Got it.

23 Q. So you're south on State Highway 33 or I-35.

24 A. Yeah. Passed all that. You passed Positano,
25 you passed Rio Bravo. Oh, hold on. Hilltop, I'm over

1 that. So you're still on International Boulevard. Keep
2 on going. It's all of the way down south -- down
3 south -- south. Keep going.

4 Q. Okay.

5 A. And there's 83 again.

6 Q. So you're right here?

7 A. That's a bridge.

8 Q. Okay. So where --

9 A. That's 83 -- right there.

10 Q. Okay. Which way do you turn on 83?

11 A. Left.

12 Q. Okay. So you're going this way, now?

13 A. Yes, sir. That's Guadalupe, that's all that.

14 See, that's H-E-B, Walgreens.

15 Q. Uh-huh.

16 A. Keep on going. Now then, keep on going all
17 83 -- there -- it's that way. Not this way. Yes. And
18 that's -- and that's Zapata, which is 83, the same
19 thing.

20 Q. Yeah.

21 A. And it goes all the way down to Zapata.

22 Q. Okay.

23 A. From then, you keep on going. Keep on going,
24 keep on going. Hold on. Oh, yeah. Keep on going.

25 That's Cielito Lindo Boulevard. Keep on going.

1 Mangana, let's keep on going. Keep on going. Keep on
2 going. That's Molina. It's Rio Bravo. Keep on going.
3 Where are we at? Yeah. Yeah.

4 Q. Keep on --

5 A. Yeah. All the way down.

6 Q. Here's the airport.

7 A. There is -- there's no airport there.

8 Q. Oh.

9 A. Yeah. That's San Ygnacio and then it's going
10 to be Zapata.

11 Q. Okay. So keep on going?

12 A. Keep on going.

13 Q. Here's the reservoir.

14 A. That's Falcon Lake. Keep on going. Keep on
15 going.

16 Q. And here's Zapata.

17 A. Zapata. Keep on going.

18 Q. Right here?

19 A. Yeah.

20 Q. So you cross another reservoir?

21 A. That's part of the same lake, but it's --

22 Q. It's still Falcon?

23 A. Yeah.

24 Q. Okay. Okay. So still on 83.

25 A. And it's around, I guess, more or less, around

1 that area.

2 Q. So in this general area?

3 A. Yeah.

4 Q. Is it north or south of Morales-Sanchez?

5 A. That's not it. Keep on going more down.

6 Q. There's the town of Falcon?

7 A. Yeah, that's -- yeah, the little town.

8 Q. So is it south of that?

9 A. Yeah, south of that.

10 Q. Okay.

11 A. It's around that area.

12 Q. Okay. And here's -- well, there's the border
13 right there.

14 A. Yeah, that's Roma. That's way -- way --

15 Q. So it's on Highway -- or off of Highway 83, in
16 between Falcon, Texas, and Roma, Texas?

17 A. Correct.

18 Q. Okay.

19 A. That's probably, like, a two-hour drive. It
20 all depends on traffic, because over there's it's --
21 it's real bad on the traffic.

22 Q. (By Mr. Smith) And, Mr. Juarez, remember
23 you're under oath. Do you use the farm for any illegal
24 activity?

25 A. No, sir.

1 Q. Okay. Do you sell marijuana on the farm?

2 A. No, sir.

3 Q. Do you grow marijuana on the farm?

4 A. No, sir.

5 Q. Do you sell any illegal drugs on the farm?

6 A. No, sir.

7 Q. Do you grow any illegal drugs on the farm?

8 A. Do I what?

9 Q. Do you grow any illegal drugs on the farm?

10 A. No, sir.

11 Q. Remember you're under oath.

12 A. Yes, sir.

13 Q. No illegal activity at all on the farm; is that
14 your testimony?

15 A. Yes, sir.

16 Q. Okay. And is it still your testimony that you
17 cannot give me an address to the farm?

18 A. Yes, sir.

19 Q. Is there anyone -- can you contact your wife to
20 get the address?

21 A. No, sir.

22 Q. Is there anyone you can contact to get the
23 address?

24 A. No, sir.

25 Q. Well, you gave information about the farm to